

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
JACKSON DIVISION

SHIRLEY BROWN, AS NATURAL MOTHER AND
NEXT FRIEND OF JOSHUA BROWN, A MINOR

PLAINTIFF

V.

CIVIL ACTION NO. 3:24-cv-00556-TSL-MTP

THE CITY OF JACKSON, MISSISSIPPI;
CHIEF JOSEPH WADE, in His Individual Capacity as
Chief of Police of City of Jackson, Mississippi;
HINDS COUNTY, MISSISSIPPI;
SHERIFF TYREE JONES, in His Individual Capacity
as Sheriff of Hinds County, Mississippi;
DR. ELAYNE HAYES ANTHONY, in Her
Individual capacity as President of Jackson State University;
HERMAN HORTON, in His Individual Capacity as
Chief of Police of Jackson State University;
TERRANCE JACKSON, in His Individual Capacity as
Detective and Officer of Jackson State University;
ALPHA PHI ALPHA FRATERNITY, DELTA PHI CHAPTER;
AND AS-YET UNKNOWN PERSON(S) OR ENTITIES
JOHN & JANE DOES 1-100

DEFENDANTS

RULE 55 MOTION FOR ENTRY OF DEFAULT

Plaintiff Shirley Brown, as natural mother and next Friend of Joshua Brown, a minor, requests the Clerk to enter default against Defendant Alpha Phi Alpha Fraternity, Delta Phi Chapter for failure to plead or otherwise defend against the First Amended Complaint as set forth in the Affidavit attached hereto as Exhibit "A".

THIS the 13th day of February, 2025.

Respectfully Submitted,

Shirley Brown, As Natural Mother And
Next Friend Of Joshua Brown, A Minor,

/s/ Vicki L. Gilliam

VICKI L. GILLIAM (MSB 9493)

Attorney for Plaintiffs

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